

REMARKS

This application has been carefully reviewed in light of the Office Action dated May 19, 2005. Claims 17 to 25 and 32 to 37 are in the application, of which Claims 17, 20 and 23 are independent. Reconsideration and further examination are respectfully requested.

Claims 17, 20 and 23 were rejected under 35 U.S.C. § 102(b) over U.S. Patent 5,080,509 (Stone), and the remaining claims were all rejected under § 103(a) over Stone in view of Japan 4-130963 (Ryuichi). Claims 26 to 31 have been cancelled without prejudice or disclaimer of subject matter, and without conceding the correctness of the rejection. As for the remaining claims, they have been broadened by deleting the requirement for a determining unit (or a determining step). Accordingly, this should be viewed as a traversal of the rejection over Stone and over Stone in view of Ryuichi, for which withdrawal is respectfully requested as detailed more fully below.

The invention concerns control over a printing apparatus wherein, in dependence on whether a designated paper type is or is not an envelope, a command is issued for printing an image along a paper feed direction if the designated type of paper is not an envelope, whereas a command is issued for printing a reverse image along the paper feed direction when the designated type of paper is an envelope.

For its part, Stone discloses a printing mechanism for envelopes and envelopes alone. Stone does not disclose or even contemplate the possibility of printing on anything other than an envelope. Accordingly, since Stone does not need to distinguish

between an envelope medium and a non-envelope medium, it is simply inconceivable that Stone could disclose issuance of a command for printing an image along a paper feed direction when a designated type of paper is not an envelope, whereas a command is issued for printing a reverse image along the paper feed direction when the designated type of paper is an envelope.

The Office Action cited two portions of Stone as allegedly disclosing a determination of whether a designated type of paper is or is not an envelope. Both portions have been reviewed carefully, but neither is seen to disclose or in any way suggest some sort of detection of whether a type of paper is or is not an envelope. In the first, at column 6, lines 56 to 64, Stone simply describes the arrangement of sensors that permit detection of whether an envelope is fully inserted, regardless of the size of the envelope:

"A sensor A mounted on intermediate panel 110 at the entrance to slot 112 detects the presence of an envelope at the top of slot 112, and sensors B and C mounted in side panels 102 and 104 at the bottom of slots 112 and 114, respectively, detect when the envelope is fully inserted. Sensors B and C may be spaced closer together than side panels 102 and 104 in order to accommodate very "short" envelopes. However, it is contemplated that the spacing of the side panels with sensors B and C therein should be sufficient for the vast majority of envelope sizes."

Thus, although this section of Stone might be read to discuss different sizes of envelopes, it nowhere differentiates between whether a designated type of paper is or is not an envelope.

In the second cited portion of Stone, at column 8, lines 1 to 42, Stone merely discloses an arrangement of sensors which determines whether an envelope has been inserted or has not yet been inserted:

"If address data arrives before an envelope is inserted, block 156 buffers the data and block 158 waits for insertion of an envelope, after which it forms a path through envelope controller subroutine 160 (FIG. 12) where block 162 causes line feed stepping motor 144 to roll the envelope into slots 112 and 114. If the envelope becomes skewed during movement toward sensors B and C, motor 144 continues to feed the envelope after its edge reaches proximity to either sensor B or C, and tends to correct the tilt. Block 164 stops line feed, if, after a predetermined count of lines, either sensor B or C has not detected the envelope. In such event, block 166 of main controller 150 allows the user to press a PRINT START button enabling block 168 to print the address and return the process to main controller 150.

"If the line count has not run out, block 170 determines whether both sensors B and C detect the bottom of the envelope. If both sensors are detected, block 172 determines whether the envelope is still detected by sensor A. If so, block 174 determines the envelope as being "tall" and returns the process to block 166 (FIG. 11) for processing in the manner described above.

"If block 172 determines that sensor A detects no envelope in the presence of signals from sensors B and C, block 176 determines it to be a "short" envelope and block 178 causes line feed motor 144 to roll the envelope back out of slots 112 and 114 until block 180 determines that sensor A detects the envelope. Block 182 measures the distance h traveled back by the envelope by counting the line feed motor "steps". The distance h is then subtracted from distance d to determine the height of the envelope. With the height of the envelope determined, the correct position for the first printed line of the address can be computed by subtracting a distance j corresponding to an average address height, i.e. three to five lines at six to eight lines per inch (2.36 to 3.15 lines per cm), and dividing the remainder by two. Subtracting from this quotient a preselected distance k between the print line and sensor A, block 184 causes line feed motor 144 to roll the envelope a distance m to arrive at the correct printing location."

Again, all of this disclosure of Stone relates solely to envelopes, and is unrelated to a differentiation between whether a designated type of paper is or is not an envelope.

The Office Action further alleged that Stone discusses printing of a reverse image. Applicant respectfully disagrees with this assessment of Stone. At best, and with

reference to portions of Stone cited in the Office Action, Stone discusses the possibility of printing an address "in reverse order":

"To permit top-first envelope insertion, the printer driving software or firmware can provide a buffer allowing the address lines to be printed in reverse order, with the bottom line of the address printed first, and the top line printed last." (Col. 5, lines 50-54)

However, printing of address lines in "reverse order" is not the same as printing of a reverse image. Moreover, there is still nothing in Stone that mentions that printing of a reverse image is somehow conditioned on whether the designated type of paper is or is not an envelope.

Ryuichi has been reviewed, but it is not seen to add anything to the above-noted deficiencies of Stone. Accordingly, Applicant respectfully submits that the invention is neither anticipated nor rendered obvious by Stone, or Stone in view of any permissible combination with Ryuichi. Allowance of the claims herein is respectfully requested.

Applicant's undersigned attorney may be reached in our Costa Mesa, California, office by telephone at (714) 540-8700. All correspondence should be directed to our address given below.

Respectfully submitted,



Attorney for Applicant
Michael K. O'Neill
Registration No. 32,622

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-2200
Facsimile: (212) 218-2200

CA_MAIN 100752v1